Enter your transmittal number → W204742
Transmittal Number

Your unique Transmittal Number can be accessed online: http://mass.gov/dep/service/online/trasmfrm.shtml or call MassDEP's InfoLine at 617-338-2255 or 800-462-0444 (from 508, 781, and 978 area codes).

Massachusetts Department of Environmental Protection

Transmittal Form for Permit Application and Payment

1. Please type or print. A separate Transmittal Form must be completed for each permit application.

2. Make your check payable to the Commonwealth of Massachusetts and mail it with a copy of this form to: DEP, P.O. Box 4062, Boston, MA 02211.

3. Three copies of this form will be needed.

Copy 1 - the original must accompany your permit application. **Copy 2** must accompany your fee payment. **Copy 3** should be retained for your records

4. Both fee-paying and exempt applicants must mail a copy of this transmittal form to:

MassDEP
P.O. Box 4062
Boston, MA
02211

*** Note:**
For BWSC Permits, enter the LSP.

A. Permit Information

BWP IW 38	Permit for Industrial Sewer User Permit
1. Permit Code: 7 or 8 character code from permit instructions	2. Name of Permit Category

Existing Connection
3. Type of Project or Activity

B. Applicant Information – Firm or Individual

Pittsfield Generating Company, L.P.
1. Name of Firm - Or, if party needing this approval is an individual enter name below:

2. **Last Name** of Individual	3. **First Name** of Individual	4. MI

235 Merrill Road
5. Street Address

6. City/Town	7. State	8. Zip Code	9. Telephone #	10. Ext. #
Pittsfield	MA	01201	413 442 6905	1117

11. Contact Person	12. e-mail address (optional)
Timothy Eglin	teglin@purenergyllc.com

C. Facility, Site or Individual Requiring Approval

Pittsfield Generating Company, L.P.
1. Name of Facility, Site Or Individual

235 Merrill Road
2. Street Address

3. City/Town	4. State	5. Zip Code	6. Telephone #	7. Ext. #
Pittsfield	MA	01201	413 442 6905	

8. DEP Facility Number (if Known)	9. Federal I.D. Number (if Known)	10. BWSC Tracking # (if Known)
50773	84-1104-853	

D. Application Prepared by (if different from Section B)*

Berkshire Environmental Consultants, Inc.
1. Name of Firm Or Individual

1450 East Street - Suite 6H
2. Address

3. City/Town	4. State	5. Zip Code	6. Telephone #	7. Ext. #
Pittsfield	MA	01201	413 443 0130	

8. Contact Person	9. LSP Number (BWSC Permits only)
Maura Hawkins	

E. Permit - Project Coordination

1. Is this project subject to MEPA review? ☐ yes ☒ no
If yes, enter the project's EOEA file number - assigned when an Environmental Notification Form is submitted to the MEPA unit:

EOEA File Number

F. Amount Due

DEP Use Only

Permit No:

Rec'd Date:

Reviewer:

Special Provisions:

1. ☐ **Fee** Exempt (city, town or municipal housing authority)(state agency if fee is $100 or less).
There are no fee exemptions for BWSC permits, regardless of applicant status.
2. ☐ Hardship Request - payment extensions according to 310 CMR 4.04(3)(c).
3. ☐ Alternative Schedule Project (according to 310 CMR 4.05 and 4.10).
4. ☐ Homeowner (according to 310 CMR 4.02).

Check Number	$1,605.00 Dollar Amount	Date

Massachusetts Department of Environmental Protection
Bureau of Waste Prevention – Industrial Wastewater

BWP IW 38 & BWP IW 39

Permit for Industrial Sewer User

204742
Transmittal Number

50773
Facility ID# (if known)

DEP Use Only

Date Received

Important Instructions for Completing This Form

The questions on this form apply to existing and new facilities discharging industrial wastewater to sewers. If you are completing this form for an existing facility, answer the questions as they apply to its current status. If you are completing this form for a new facility, your answers will reflect your commitment to comply with the requirements as set forth in each question.

Existing facilities are defined as facilities in existence as of July 12, 2007. New facilities are defined as facilities constructed after July 12, 2007.

Answer all questions, except those that you are directed to skip. Please DO NOT answer questions that you are directed to skip

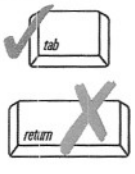
Permit Category (Select One)

☒ BWP IW 38: Industrial Sewer User in IPP POTW discharging more than 50,000 GPD

☐ BWP IW 39: Industrial Sewer User in Non-IPP POTW discharging more than 25,000 GPD

A. Facility Information

Important: When filling out forms on the computer, use only the tab key to move your cursor - do not use the return key.



Pittsfield Generating Company, L.P.
1a. Facility Name

235 Merrill Road
1b. Facility Address 1

1c. Facility Address 2

Pittsfield | MA | 01201
1d. City | 1e. State | 1f. Zip Code

413 442-6905
1g. Phone Number

1h. Fax Number

84-1104-853
1i. Federal Employer Tax Identification Number (FEIN or TIN)

Mailing Address: ☒ Check here if same as Facility Address and skip to Contact Information.

2a. Mailing Address: Street or P.O. Box

2b. Mailing Address 2

2c. City | 2d. State | 2e. Zip Code

Contact Information:

Timothy Eglin
3a. Contact Person Name

General Manager
3b. Contact Person Title

413 442-6905 | 1117
3c. Phone Number | 3d. Extension

teglin@purenergyllc.com
3e. Email Address

B. Industrial Wastewater Information

1. Project Description (Check All That Apply)

☐ 1a. New Construction

☐ 1b. Permit Renewal

☐ 1c. Increasing Flow From Existing Connection

☐ 1d. New or Modified Industrial Wastewater Pretreatment System (IWPS)

☒ 1e. Existing Unpermitted Connection (Constructed Before 7/12/07)

2. List, in descending order of significance, the Standard Industrial Classification (SIC) codes, which best describe the facility producing the discharge in terms of the principal products or services provided. Also, specify each classification title. (See Appendix B in the Instructions)

4911 2a. SIC Code	Combined Cycle Cogeneration Plant (steam electric)
2b. SIC Code	Description
2c. SIC Code	Description
2d. SIC Code	Description

3. List all sewer connection(s) and their maximum daily flow(s) in gallons per day (GPD) from your facility going to the Publicly Owned Treatment Works (POTW):

	1 3a. Connection #	3b. Connection #	3c. Connection #	3d. Total Flow, All Connections
SANITARY	1000 GPD	GPD	GPD	GPD
INDUSTRIAL	561,600 GPD	GPD	GPD	GPD
TOTAL	562,600 GPD	GPD	GPD	GPD

4. Are you in compliance with the Massachusetts Historical Commission requirements?

☒ Yes ☐ No* *If No, You Must Comply With Massachusetts Historical Commission Requirements **BEFORE** You Can Submit This Application.

5. Are you in compliance with Massachusetts Environmental Policy Act (MEPA) requirements?

☒ Yes ☐ No* *If No, You Must Comply With MEPA Requirements **BEFORE** You Can Submit This Application.

B. Industrial Wastewater Information (continued) Wastewater Prior to Pretreatment

6. Check all pollutants that are present in your industrial wastewater **before** pretreatment, or if not treated, before discharge:

☒ 6a. Metals, Asbestos, Cyanide, Phenols See Note 2

If Metals, Asbestos, Cyanide, or Phenols are present, provide concentrations in milligrams per liter (mg/L):

1. Antimony (total) (Sb)	mg/L	9. Nickel (total) (Ni)	mg/L
2. Arsenic (total) (As)	mg/L	10. Selenium (total) (Se)	mg/L
3. Beryllium (total) (Be)	mg/L	11. Silver (total) (Ag)	mg/L
4. Cadmium (total) (Cd)	mg/L	12. Thallium (total) (Tl)	mg/L
5. Chromium (hexavalent)	mg/L	13. Zinc (total) (Zn)	0.031 mg/L
6. Chrome (total) (Cr)	mg/L	14. Asbestos	mg/L
7. Copper (total) (Cu)	mg/L	15. Cyanide (total) (CN)	mg/L
8. Lead (total) (Pb)	mg/L	16. Phenols (total)	mg/L

☐ 6b. Toxic Pollutants (See Section 17B in the Instructions.)

If Toxic Pollutants are present, provide the total Toxic Pollutants concentration in micrograms per liter (ug/L):

_____
6b1. Total Toxic Pollutants Concentration (ug/L)

NOTE: Use the **Toxic Pollutants Form** to list individual toxic chemicals and their concentrations.

☐ 6c. Total Petroleum Hydrocarbons (TPH) > 15 mg/L

☐ 6d. pH <5 and >10 Standard Units (S.U)

☐ 6e. Other*

*If Other Pollutants are present, describe them:

_____

_____

_____

B. Industrial Wastewater Information (continued) **Untreated Wastewater**

6. Check all pollutants that are present in your industrial wastewater **before** pretreatment, or if not treated, before discharge:

☒ 6a. Metals, Asbestos, Cyanide, Phenols See Note 2

If Metals, Asbestos, Cyanide, or Phenols are present, provide concentrations in milligrams per liter (mg/L):

1. Antimony (total) (Sb)	mg/L	9. Nickel (total) (Ni)	0.0067 mg/L
2. Arsenic (total) (As)	0.0037 mg/L	10. Selenium (total) (Se)	mg/L
3. Beryllium (total) (Be)	mg/L	11. Silver (total) (Ag)	mg/L
4. Cadmium (total) (Cd)	mg/L	12. Thallium (total) (Tl)	mg/L
5. Chromium (hexavalent)	mg/L	13. Zinc (total) (Zn)	0.028 mg/L
6. Chrome (total) (Cr)	0.0068 mg/L	14. Asbestos	mg/L
7. Copper (total) (Cu)	0.0227 mg/L	15. Cyanide (total) (CN)	mg/L
8. Lead (total) (Pb)	0.002 mg/L	16. Phenols (total)	mg/L

☐ 6b. Toxic Pollutants (See Section 17B in the Instructions.)

If Toxic Pollutants are present, provide the total Toxic Pollutants concentration in micrograms per liter (ug/L):

6b1. Total Toxic Pollutants Concentration (ug/L)

NOTE: Use the **Toxic Pollutants Form** to list individual toxic chemicals and their concentrations.

☐ 6c. Total Petroleum Hydrocarbons (TPH) > 15 mg/L

☐ 6d. pH <5 and >10 Standard Units (S.U)

☐ 6e. Other*

*If Other Pollutants are present, describe them:

B. Industrial Wastewater Information (continued) Wastewater Prior to Pretreatment

7. Is Mercury (Hg) present in your industrial wastewater **before** pretreatment, or if not treated, before discharge? See Note 2

☒ Yes ☐ No* *If No, skip to Question 8.

7a. If Yes, have you identified all possible mercury sources and taken all reasonable steps to eliminate the mercury?

☒ Yes* ☐ No *If Yes, skip to Question 8.

7b. If No, explain why.

NOTE: As of May 1, 2009, all facilities must meet a discharge limit of 1 part per billion (ppb) for Mercury.

8. What is the name of the Publicly Owned Treatment Works (POTW) that receives your wastewater? (See Appendix C in the Instructions.)

City of Pittsfield Dept. of Public Works & Utilities
Name of POTW

9. Do you have a current sewer connection discharge permit or a current written approval issued by your local POTW? (See Section 17B in the Instructions.)

☒ Yes ☐ No* *If No, you must obtain either a permit or, if a permit is not required, a written approval from your local POTW to discharge **BEFORE** you can submit this application.

If you have a permit, provide the following information, then skip to Question 10.

90-1240
9a. Permit Number

July 31, 2008
9b. Permit Expiration Date

If you have a written approval, provide the following information:

9c. Date of Approval Letter

9d. Name of Person Who Signed the Letter

10. Are your POTW and local Sewer Authority the same entity? (See Section 17B in the Instructions.)

☒ Yes* ☐ No *If Yes, skip to Question 12.

B. Industrial Wastewater Information (continued) Untreated Wastewater

7. Is Mercury (Hg) present in your industrial wastewater **before** pretreatment, or if not treated, before discharge? See Note 2

☒ Yes ☐ No* *If No, skip to Question 8.

7a. If Yes, have you identified all possible mercury sources and taken all reasonable steps to eliminate the mercury?

☒ Yes* ☐ No *If Yes, skip to Question 8.

7b. If No, explain why.

NOTE: As of May 1, 2009, all facilities must meet a discharge limit of 1 part per billion (ppb) for Mercury.

8. What is the name of the Publicly Owned Treatment Works (POTW) that receives your wastewater? (See Appendix C in the Instructions.)

City of Pittsfield Dept. of Public Works & Utilities
Name of POTW

9. Do you have a current sewer connection discharge permit or a current written approval issued by your local POTW? (See Section 17B in the Instructions.)

☒ Yes ☐ No* *If No, you must obtain either a permit or, if a permit is not required, a written approval from your local POTW to discharge **BEFORE** you can submit this application.

If you have a permit, provide the following information, then skip to Question 10.

90-1240
9a. Permit Number

July 31, 2008
9b. Permit Expiration Date

If you have a written approval, provide the following information:

9c. Date of Approval Letter

9d. Name of Person Who Signed the Letter

10. Are your POTW and local Sewer Authority the same entity? (See Section 17B in the Instructions.)

☒ Yes* ☐ No *If Yes, skip to Question 12.

B. Industrial Wastewater Information (continued)

11. Do you have a current sewer connection discharge permit or a current written approval issued by your local Sewer Authority? (See Section 17B in the Instructions.)

☐ Yes ☐ No* If No, you must obtain either a permit or written approval from your local Sewer Authority to discharge **BEFORE** you can submit this application.

If you have a permit, provide the following information, then skip to Question 12.

11a. Permit Number

11b. Permit Expiration Date

If you have a written approval, provide the following information:

11c. Date of Approval Letter

11d. Name of Person Who Signed the Letter

12. Is your facility currently classified as a Categorical Industrial User (CIU) pursuant to Federal Regulations? (See Appendix D in the Instructions.)

☒ Yes ☐ No* *If No, skip to Section C.

12a. List all the Categorical Pretreatment Standards applicable to your facility.

40 CFR 423	Steam Electric Power Generating
12a1. Part Number	Point Source Category
12a2. Part Number	Point Source Category
12a3. Part Number	Point Source Category
12a4. Part Number	Point Source Category

C. Industrial Wastewater Pretreatment System

1. Do you have an on-site industrial wastewater pretreatment system (IWPS) to treat your industrial wastewater?

☒ Yes ☐ No* *If No, skip to Section D.

1a. How many IWPSs do you have?

1
Number

NOTE: If you have more than one IWPS, please use an **Additional IWPS Form** for each additional IWPS.

1b. Provide a unique identifier (i.e. name) for this IWPS:

pH Neutralization
Identifier/Name

C. Industrial Wastewater Pretreatment System (continued)

1c. What is the Total Design Capacity of this IWPS?

250,000 (See Note 3)
Gallons Per Day

1d. What is the Average Daily Flow of this IPWS? (Estimate if this is a new facility.)

30,000 (See Note 4)
Gallons Per Day

1e. What is the Maximum Daily Flow of this IWPS? (Estimate if this is a new facility.)

250,000 (See Note 5)
Gallons Per Day

2. Is your IWPS designed and constructed to meet all local discharge standards and the applicable Categorical Industrial User (CIU) standards in 40 CFR Chapter I, Subchapter N?

☒ Yes ☐ No* *If No, you must take immediate steps to address the non-compliance **BEFORE** you can submit this application.

3. Does this IWPS treat hazardous industrial wastewater or hazardous industrial wastewater sludge as defined in 314 CMR 7.02?

☐ Yes ☒ No* *If No, skip to Question 12.

3a. Are you treating concentrated chemical baths, e.g. spent chemical baths, or off-specification products?

☐ Yes ☐ No* *If No, skip to Question 4.

3b. If Yes, describe the concentrated chemical baths you are treating.

4. Does your IWPS meet the requirements of "treatment which is an integral part of the manufacturing process" as defined in 310 CMR 30.010?

☐ Yes* ☐ No *If Yes, skip to Question 7.

5.Do you store hazardous industrial wastewater or hazardous industrial wastewater sludge that is generated in your IWPS or in your production processes, in tanks or containers?

Note: If you use in-ground tanks for storage of hazardous industrial wastewater or sludge and your IWPS is located in a Drinking Water Zone (see Section 17C of the Instructions; reference language in 310 CMR 30.605), you are not eligible to apply for a BWP IW 38 or BWP IW 39 permit. You must use form BWP IW 40 instead.

☐ Yes ☐ No* *If No, skip to Question 7.

C. Industrial Wastewater Pretreatment System (continued)

6. Are you in compliance with the requirements for tanks and containers in 310 CMR 30.342 and 343? (See Section 17C in the Instructions)

☐ Yes ☐ No* *If No, you must take immediate steps to address the non-compliance **BEFORE** you can submit this application.

7. Do you have a U.S. Environmental Protection Agency (EPA) hazardous waste generator identification number?

☐ Yes ☐ No* *If No, skip to Question 7b.

7a. What is your EPA identification number?

_____ Skip to Question 8.
EPA ID #

7b. Explain why you do not have an EPA identification number.

_____

_____

_____

8. Do you have a visible sign in place that warns against unauthorized entry into the IWPS area?

☐ Yes* ☐ No *If Yes, skip to Question 9.

8a. Explain why you do not have a visible sign in place.

_____

_____

_____

9.Do you have the required spill containment for the IWPS? (See Section 17C in the Instructions.)

☐ Yes* ☐ No *If Yes, skip to Question 10.

9a. Explain why you do not have the required spill containment.

_____

_____

_____

10. Is your IWPS located on land subject to flooding from a 100-year storm? (See Section 17C in the Instructions.)

☐ Yes ☐ No* *If No, skip to Question 12.

C. Industrial Wastewater Pretreatment System (continued)

11. Are you in compliance with the flood-proofing provisions in 310 CMR 30.701(2)? (See Section 17C in the Instructions.)

☐ Yes ☐ No* *If Yes, skip to Question 12.

11a. Explain why you are not in compliance with the flood-proofing provisions in 310 CMR 30.701(2).

12. What type of IWPS do you have? (Check all that apply.)

☐ Fully Automated Industrial Wastewater Pretreatment System (FAIWPS)

☐ Continuous Discharge IWPS ☒ Batch IWPS

13. Is the IWPS exempt from classification? (See Section 17C in the Instructions.)

☐ Yes* ☒ No *If Yes, skip to Question 14.

13a. What is the classification of this IWPS? (See 257 CMR 2.13: Classification of Wastewater Treatment Facilities.)

☐ Class 1I ☒ Class 2I ☐ Class 3I

☐ Class 4I ☐ Class 5 or 6C ☐ Class 1M

☐ Class 2M ☐ Class 3M ☐ Class 4M

13b. How was the IWPS' classification determined?

☒ In accordance with the requirements in 314 CMR 7.05(2)(g) 4. c. or d.

☐ By the Board of Certification of Operators of Wastewater Treatment Facilities

☐ Both

14. Is the IWPS staffed in accordance with the requirements of 314 CMR 7.05(2)(g) 5? (See Section 17C in the Instructions.)

☒ Yes* ☐ No *If Yes, skip to Question 15.

C. Industrial Wastewater Pretreatment System (continued)

14a. Explain why the IWPS is not staffed in accordance with 314 CMR 7.05(2)(g) 5.

15. Is this your first permit application under Permit Category BWP IW 38 or BWP IW 39 for this IWPS? Or, is this application a request for modification of this IWPS that currently has a BWP IW 38 or BWP IW 39 permit?

☒ Yes* ☐ No

*If Yes, you need to submit as an attachment the process flow diagram and description of the principal treatment processes for your IWPS. Otherwise, skip to Question 17.

16. How many attachments are included with this application in response to Question 15?

2 (Attachment B-1 Process Flow Diagram and Attachment B-2 Process Description)

17. Have your sewer connection and IWPS been designed and constructed in compliance with the design and construction standards as set forth in 314 CMR 7.05(2)(g)3?

☒ Yes ☐ No*

*If No, skip to Question 17b.

See Note 6

17a. What is the Massachusetts Registered Professional Engineer (MAPE) signature date on the engineering plans?

See Note 6
Date

Skip to Question 18.

17b. Explain why your sewer connection and IWPS have not been designed and constructed in compliance with the design and construction standards as set forth in 314 CMR 7.05(2)(g)3.

See Note 6

18. Provide the following information about the Massachusetts Registered Professional Engineer (MAPE) who reviewed, stamped, and signed your engineering plans:

James H. Thayer
18a. Name

413 447-7585
18b. Phone Number

16498
18c. Mass. P.E. License Number

Environmental
18d. Mass. P.E. Specialty

C. Industrial Wastewater Pretreatment System (continued)

19. Do you have an IWPS operation and maintenance manual that complies with the procedures and other requirements in 314 CMR 7.05(2)(g)6.?

☒ Yes* ☐ No *If Yes, skip to Question 20.

19a. Explain why you do not have the required IWPS operation and maintenance manual.

20. Are you keeping your IWPS operation and maintenance manual current?

☒ Yes ☐ No

21. Are you implementing your IWPS operation and maintenance manual?

☒ Yes ☐ No

D. Monitoring, Reporting & Recordkeeping

1. Are you keeping your currently effective sewer discharge permit(s), IWPS plan(s), and current operation and maintenance manual(s) (as applicable) on-site at all times?

☒ Yes* ☐ No * If Yes, skip to Question 2.

1a. Explain why you are not keeping these records on-site at all times.

2. Are you keeping all your required records including your wastewater monitoring and analyses records, operation and maintenance records and logs, bills of lading, summary reports of all incidents requiring implementation of the safety plan, and hazardous waste manifests (as applicable) on-site for at least three years?

☒ Yes* ☐ No * If Yes, skip to Question 3.

2a. Explain why you are not keeping these records on-site for at least three years.

D. Monitoring, Reporting & Recordkeeping (continued)

3. [Reserved for Toxics Reporting]

Additional reporting requirements will be added to this section in the future.

E. General & Specific Prohibitions

1. After carefully reviewing all of the general and specific prohibitions listed below, are you in compliance with these General and Specific Prohibitions?

☒ Yes* ☐ No *If Yes, read Section F and then complete Section G.

1a. Identify all the prohibitions you are not in compliance with and explain why. Attach an additional sheet of paper to this form, if necessary.

1. General Prohibitions. The permittee shall not:

a. Discharge, or cause to be discharged to a POTW, any substances, materials, or wastewater that may:

i. harm the sewers, POTW wastewater treatment process or equipment;
ii. have an adverse impact on the receiving waters; or
iii. otherwise create a nuisance or endanger public health, safety, or the environment.

b. Introduce pollutants into POTWs that pass through the POTW or interfere with its operation or performance.

c. Discharge wastewater or allow discharge of wastewater through any sewer connection that would result in a hazard to the public health or safety.

d. Discharge bypass wastewater or allow discharge of bypass wastewater through any sewer connection. If bypassing due to an emergency condition occurs, the Department and POTW shall be notified in accordance with 314 CMR 7.04(3). Such notification or its acknowledgement shall not be construed as permission by the Department or POTW to discharge bypass wastewater.

e. Discharge hazardous waste or allow the discharge of hazardous waste through any sewer connection.

2. Specific Prohibitions. The permittee shall not introduce into a POTW or its wastewater collection system the following:

a. Pollutants which may create a fire, explosion, or other hazard in the POTW or its wastewater collection system.

b. Pollutants which may cause corrosive structural damage to the POTW or its wastewater collection system. In no case shall discharges with a pH lower than 5.0 Standard Unit (S.U) or more than 10.0 S.U. be allowed, unless the local limit allows such discharges.

c. Solid or viscous pollutants in amounts which may cause obstruction to the flow in the POTW or its wastewater collection system or may result in interference.

d. Any pollutant, including oxygen-demanding pollutants, discharged at a flow rate or pollutant concentration that will cause interference with the POTW or its wastewater collection system.

e. Heat in amounts which may inhibit biological activity in the POTW, resulting in interference. In no case shall heat in such quantities that the temperature at the POTW treatment plant exceeds 40° C (104° F) be discharged, unless the Department, upon request of the POTW, approves alternate temperature limits.

F. Additional Conditions

a. All discharges shall be in compliance with the terms and conditions of this permit. The discharge of any wastewater at a level in excess of that identified and authorized by this permit shall constitute a violation of the terms and conditions of this permit. Such a violation may result in the imposition of civil and/or criminal penalties as provided for in M.G.L. c.21, Section 42.

b. After notice and opportunity for a hearing, this permit may be modified, suspended, or revoked in whole or in part during its term for cause including, but not limited to, the following:

i. Violation of any terms or conditions of the permit;

ii. Obtaining a permit by misrepresentation or failure to disclose fully all relevant facts; or

iii. A change in conditions or the existence of a condition, which requires either a temporary or permanent reduction, or elimination of the authorized discharge.

c. The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges; nor does it authorize or relieve the permittee of any liability for any injury to private property or any invasion of personal rights; nor any infringement of Federal, State, or local laws or regulations; nor does it waive the necessity of obtaining any local assent required by law for the discharge authorized herein by the Department.

d. The provisions of this permit are severable, and the invalidity of any condition or subdivision thereof shall not make void any other condition or subdivision thereof.

e. All information and data provided by an applicant or a permittee identifying the nature and frequency of a discharge shall be available to the public without restriction. All other information (other than effluent data) which may be submitted by an applicant in connection with a permit application shall also be available to the public unless the applicant or permittee is able to demonstrate that the disclosure of such information or particular part thereof to the general public would divulge methods or processes entitled to protection as trade secrets in accordance with the provisions of M.G.L. c.21, Section.27(7). Where the applicant or permittee is able to so demonstrate, the Department shall treat the information or the particular part (other than effluent data) as confidential and not release it to any unauthorized person. Such information may be divulged to other officers, employees, or authorized representatives of the Commonwealth or the United States Government concerned with the protection of public water or water supplies.

f. Transfer of Permits. Any sewer system connection permit authorizing an industrial discharge to a sewer system is only valid for the person to whom it is issued, unless prior to transfer:

i. The current permittee notifies the Department in writing at least 30 days in advance of the proposed transfer date; and

ii. The notice includes a written agreement between the existing and new permittees containing a specific date for transfer of permit responsibilities, and liability to the new permittee.

g. This permit authorizing the discharge expires five (5) years from the date of issuance. The permittee shall apply for a renewal of this permit at least ninety (90) days prior to the expiration date, in accordance with 314 CMR 7.09(3)(b) for continued lawful discharges beyond the expiration date.

h. All solids, sludge, filter backwash, or other pollutants removed in the course of treatment or control of wastewaters shall be collected, treated, and disposed of in accordance with applicable provisions in the following:

i. Hazardous waste regulations (310 CMR 30.000).

ii. Solid waste regulations (310 CMR 19.00).

iii. Sewer discharge regulations (314 CMR 7.00).

iv. Any other applicable federal, state and local laws.

i. All samples shall be analyzed by a Massachusetts Certified Laboratory.

j. The permittee shall provide the Department, and the Department's employees, authorized representatives and contractors, access at to the facility at all reasonable times, including during wastewater treatment system operation or wastewater discharge, for purposes of conducting activities related to oversight of this permit, including inspections to monitor compliance with the terms herein. The permittee shall allow the Department to obtain information related to compliance with the requirements of this permit. Notwithstanding any provision of this permit, the Department retains all of its access authorities and rights under applicable state and federal law.

Massachusetts Department of Environmental Protection
Bureau of Waste Prevention – Industrial Wastewater

BWP IW 38 & BWP IW 39

Permit for Industrial Sewer User

204742
Transmittal Number

50773
Facility ID# (if known)

G. Certification Statement

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true accurate, and complete. I certify that this facility is in compliance with all conditions and requirements of this permit, and all applicable statutes and regulations. I further certify that systems to maintain compliance are in place at the facility or unit and will be maintained even if processes or operating procedures are changed. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment of knowing violations."

(I will be responsible for publication of public notice of the applicable permit proceedings identified under 314 CMR 2.06(1)(a) through (d).)

Timothy Eglin
Printed Name of Applicant

General Manager
Title

Signature of Applicant

Date Signed

Maura Hawkins
Name of Preparer

President, Berkshire Environmental Consultants, Inc.
Title

413 443 0130
Phone Number

MassDEP Use Only

Special Conditions:

This document is a permit issued pursuant to Massachusetts General Laws, Chapter 21, Section 43 and Massachusetts regulations at 314 CMR 7.00. The permittee shall comply with all of the provisions contained in the permit application which are hereby incorporated and made part of this permit.

Date Issued

Permit Effective Date

Permit Expiration Date

Name of Regional BWP Section Chief

Signature

Attachment A
Notes to Accompany BWP IW 38

(1) Section B, Question 3: The maximum flow for the industrial sewer is based on a peak pumping rate of 390 gallons per minute.

(2) Section B, Question 6: There are two industrial wastewater streams that combine in the facility flow equalization tank and are then discharged from the Pittsfield Generating Company, L.P. facility to the POTW:

- one minor wastewater stream from the demineralization system, demineralization building sump and bulk chemical containment areas chemical that is batch treated in a pH neutralization system (IWPS) and discharged to the flow equalization tank; and
- a larger wastewater stream from the rest of the facility operations that does not require treatment, does not pass through the IWPS and is discharged directly to the flow equalization tank.

Therefore, there are two data sets for question B.6. Pages 3a and 4a reflect the industrial discharge that passes through the IWPS. Pages 3b and 4b reflect the discharge that is untreated. As required, the analytical data for the discharge that passes through the IWPS (i.e. Pages 3a and 4a) reflect concentrations prior to treatment. Please note that a blank line indicates that the analyte was not detected or expected to be detected in the wastewater stream.

(3) Section C, Question 1c.: The **Total Design Capacity** of the IWPS is calculated as follows:

The design capacity of the neutralization tank system is **250,000 gallons per day** based on a maximum of two 100,000 gallon full regenerations of the demineralizer system cation and anion beds and one 50,000 regeneration of the demineralizer system mixed bed polisher.

(4) Section C, Question 1d.: The **Average Daily Flow** of the IWPS is calculated as follows:

Average daily flow is estimated based on one full demineralizer regeneration which is approximately 100,000 gallons approximately once every three days or **30,000 gallons per day**.

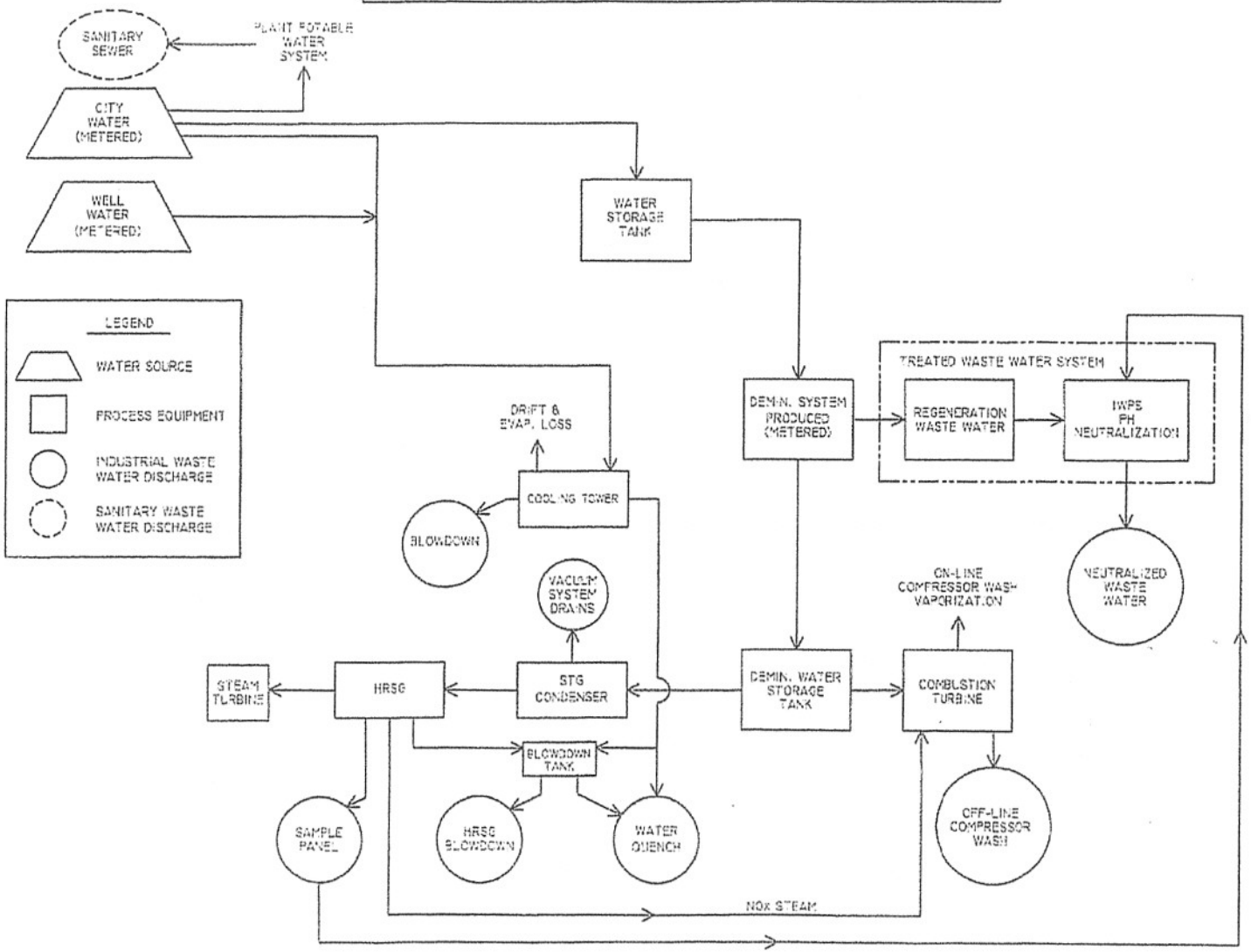
(5) Section C, Question 1e.: The **Maximum Daily Flow** of the IWPS is calculated as follows:

The design capacity of the neutralization tank system is **250,000 gallons per day** based on a maximum of two 100,000 gallon full regenerations of the demineralizer system cation and anion beds and one 50,000 regeneration of the demineralizer system mixed bed polisher.

(6) Section C, Questions 17 and 17b.: The sewer connection and IWPS were designed and constructed in accordance with the engineering standards and regulations in place at the time of permitting and construction. 310 CMR 7.05(2)(g)3 did not exist at that time. The MassDEP and POTW plan applications at that time were signed by a registered MAPE. A review of the system indicates that the system and connection apparently meet the current applicable standard at 310 CMR 7.05. The information provided in Question 18 reflects the MAPE who signed the original plan application which was submitted and approved by MassDEP.

Attachment B-1
BWP IW 38
Process Flow Diagram

PITTSFIELD GENERATING COMPANY, L. P.
PLANT WATER & WASTEWATER PROCESS/FLOW DIAGRAM
YEAR 2008



DWG. NO. 090108-01
DRAWN 01/10/2008

Attachment B-2
BWP IW 38
Facility and Process Descriptions

Facility Description

PGC operates a 160 MW natural gas fired turbine combined cycle cogeneration facility on a five acre plot in Pittsfield, Massachusetts. Electrical power is produced by two natural gas turbine generators and one steam turbine generator. The electricity is stepped up to 115 kV and is transmitted from an on-site switchyard to a high voltage substation for subsequent sale to electric. A selective catalytic reduction (SCR) system is used to remove nitrogen oxides (NOx) from the combustion turbine exhaust.

Wastewater Generation

Sanitary sewage and industrial wastewater are generated at PGC. Sanitary sewage is approximately 1,000 gpd. Sanitary sewage is collected and discharged directly to the City of Pittsfield POTW.

Industrial wastewater is generated from five general process areas. The major process wastewater sources are as follows:

- Cooling tower blowdown;
- heat recovery steam generator (HRSG) blowdown;
- demineralizer regeneration waste water;
- oily wastewater; and
- steam turbine generator drain

All process wastewater is discharged from a flow equalization tank to the City of Pittsfield POTW.

Cooling Tower Blowdown
The function of the cooling tower is to remove heat from the steam turbine exhaust. Water is evaporated from the surface of the cooling tower in order to remove the heat. Makeup water is provided in replace of the evaporated water. In order to prevent deposition and scaling in the cooling tower, a constant blowdown is used. The blowdown is collected in the flow equalization tank and discharged to the POTW.

Heat Recovery Steam Generator (HRSG) Blowdown
The HRSG provides steam for steam injection for NOx control and steam to drive the steam turbine. Makeup water is provided to replace the process steam and NOx injection losses. To control dissolved solids levels in the HRSG, approximately 30 gpm of water is bled from the boiler as blowdown. The blowdown is collected in the flow equalization tank and discharged to the POTW.

Demineralizer Wastewater

Water supply for the HRSG makeup is treated for removal of dissolved solids to maintain boiler feed water quality. City water and well water are treated three bed demineralizing system for removal of dissolved solids. The three bed system includes a cation bed, an anion bed and a mixed bed polisher. Wastewater from this system includes the regeneration wastes from the ion-exchange resins used to remove the dissolved solids. Acids and caustics are used to regenerate the ion-exchange resins. These wastes are discharged directly to a neutralization tank. The frequency of regeneration of the demineralizer system is dependent on the quality of the incoming raw water and the operating hours of the turbines and HRSGs. When operating at full plant load the cation and anion beds are regenerated as necessary. A full regeneration of the cation and anion beds results in a total wastewater flow of approximately 100,000 gallons. The mixed bed polisher is regenerated less frequently on an as needed basis. A mixed bed regeneration results in an additional wastewater flow of approximately 50,000 gallons of wastewater.

Steam Turbine Generator (STG) Drain

The STG converts steam to megawatts. The primary water flow is from the vacuum system intercondenser condensate eductor at a rate of 12 gpm. The condensate is directed to the steam turbine sump and oil water separate and then to the flow equalization tank and discharged to the POTW.

Oily Wastewater

Sumps are used to collect oily wastewater from the GTG and STG buildings. These sumps collect periodic wash water from the plant floor drains and other maintenance wastes. This wastewater flows to an oil water separator at a rate of approximately 50 gpm and then to the flow equalization tank.

Wastewater Treatment

A portion of the wastewater from the Pittsfield Generating Facility is treated to meet the City of Pittsfield pre-treatment requirements. The applicable pre-treatment limits include pH 5.5-9.5, oil and grease less than 100 mg/l and temperature less than 140° F. These requirements are met by the use of a neutralization system, an oil/water separator and a wastewater equalization system that are described below.

pH Neutralization

Wastewater discharged from the demineralized water system requires neutralization to a pH range of 5.5-9.5 to comply with the City of Pittsfield wastewater discharge permit. A batch neutralization system is used. The neutralization tank collects acidic or caustic wastewater from the demineralizer system. The tank is equipped with an external pumped recirculation system and pH equipment to provide an automatic pH neutralization system. Neutralizing acid and caustic feed are automatically pumped. The system operates in a batch mode and wastewater is only transferred when neutralization is complete. The pH of the wastewater is monitored during transfer to the wastewater holding tank and an alarm sounds if the pH is outside allowable limits.

Oil/Water Separator

Oily wastewater from the sumps in the turbine building and the HRSG area require treatment for the removal of oil and grease. The oily water system is designed to remove oil continuously to 15 m/gl. Oil is pumped from the separator periodically and removed by a licensed hauler as waste oil.

Flow Equalization Tank Wastewater Holding Tank

A 75,000 gallon flow equalization is provided to accept wastewater from all the process wastewater sources. The tank acts as an equalization system to account for the fluctuations in the process wastewater flows. The wastewater discharge rate from the wastewater holding tank is controlled to a maximum flow 390 gpm. The normal annual average flow is typically less than that.